

EXHIBIT 8

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON ISSUES OF INFRINGEMENT AND DEFENDANTS' INVALIDITY DEFENSES

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

SIGNIFY NORTH AMERICA	:
CORPORATION and SIGNIFY HOLDING	:
B.V.,	:
	:
Plaintiffs,	: CIVIL ACTION FILE
	: NUMBER:
versus	: 2:22-cv-2095
	:
LEPRO INNOVATION INC., LE	:
INNOVATION INC., INNOVATION	:
RULES INC., HOME EVER INC., and	:
LETIANLIGHTING, INC.,	:
	:
Defendants.	:

VIDEOTAPED DEPOSITION OF
JOHN W. CURRAN, PH.D.

Volume II

9:14 a.m.
October 16, 2024

REGUS BUSINESS CENTER
100 Bull Street
Second Floor
Savannah, Georgia

Job No.: 556581
Pages: 246 - 487

Stenographically Reported By:
Susan DiFilippantonio, RPR, RMR, California CSR 14383

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22 and LETIANLIGHTING, INC.:

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Also Present: Matthew Simpson, videographer
Eyal Filkovsky, technician
Aaron Rugh, in-house counsel Signify
Gary Yen, in-house counsel Signify
(via videoconference)

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1	(Wednesday, October 16, 2024	9:14 a.m.)	09:15:07
2	TECHNICIAN: Please stand by for the		09:13:31
3	technician read-on and backup recording. Zoom will		09:13:33
4	now prompt you for your consent to video-record		09:13:35
5	this meeting for backup purposes.		09:13:38
6	Thank you to everyone for attending this		09:13:41
7	proceeding remotely, which we anticipate will run		09:13:42
8	smoothly. Please remember to speak slowly and do		09:13:45
9	your best not to talk over one another. Please be		09:13:48
10	aware that we are recording this proceeding for		09:13:50
11	backup purposes. Any off-the-record discussions		09:13:53
12	should be had away from the computer. Please		09:13:56
13	remember to mute your mic for those conversations.		09:13:59
14	Please have your video enabled to help the reporter		09:14:02
15	identify who is speaking. If you are unable to		09:14:05
16	connect with video and are connecting via phone,		09:14:08
17	please identify yourself each time before speaking.		09:14:10
18	I apologize in advance for any technical-related		09:14:13
19	interruptions. Thank you.		09:14:16
20	THE VIDEOGRAPHER: All right. Please		09:14:21
21	stand by for video.		09:14:23
22	Here begins Media Number 1 in the		09:14:39
23	continued videotaped deposition of John W. Curran,		09:14:41
24	Ph.D., in the matter of Signify North America		09:14:46
25	Cooperation, et al., v. Lepro Innovations, Inc., et		09:14:48

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1 al., in the United States District Court for the 09:14:52

2 District of Nevada, Case Number 2:22-CV-02095. 09:14:54

3 Today's date is October 16th, 2024, and the time on 09:15:01

4 the video monitor is 9:14 a.m. Videographer today 09:15:04

5 is Matthew Simpson, representing Planet Depos. 09:15:09

6 This video deposition is taking place at 22 Bull 09:15:11

7 Street, Third Floor, Savannah, Georgia 31401. 09:15:15

8 Would counsel please voice-identify 09:15:18

9 themselves and state whom they represent. 09:15:20

10 MR. SWAIN: Hello and good morning. This 09:15:22

11 is Adam Swain from the law firm of Alston & Bird on 09:15:24

12 behalf of the Signify plaintiffs. 09:15:28

13 With me, as well, is Mr. Jeremy Occek, 09:15:29

14 Mr. Jonathan Gray -- that's the American, not the 09:15:34

15 British spelling -- of the Bond Schoeneck firm, as 09:15:35

16 well as in-house counsel, Mr. Aaron Rugh. 09:15:37

17 MR. CHEN: Good morning. This is Hua 09:15:40

18 Chen from the law firm of ScienBiziP, PC, hereby 09:15:42

19 representing the Lepro defendants. 09:15:47

20 THE VIDEOGRAPHER: The Court Reporter 09:15:49

21 today is Susan DiFilippantonio, representing Planet 09:15:50

22 Depos. The witness will now be sworn. 09:15:54

23 JOHN W. CURRAN, PH.D.,

24 called as a witness at the instance of the Plaintiffs,

25 being first duly sworn, was examined and deposed as

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1	I'm on the signature page.	15:37:41
2	BY MR. OCZEK:	15:37:43
3	Q. Okay. And is that your signature on the	15:37:43
4	signature page?	15:37:45
5	A. Yes.	15:37:46
6	Q. And that was signed on August 19, 2024?	15:37:46
7	A. It was signed on whatever date -- yeah, if it's	15:37:50
8	signed and that's the date on it, that's the date it was	15:37:56
9	signed.	15:37:58
10	Q. Okay. On that same page, sir, look at paragraph	15:37:59
11	84 in the heading above that which says the '399 and	15:38:05
12	'138 patent Dr. Zane's expert report. Do you see that?	15:38:11
13	A. Yes.	15:38:15
14	Q. And then paragraph 84 says I was asked to not	15:38:16
15	spend any time responding to Dr. Zane's expert report	15:38:20
16	regarding the '138 and '399 patent, thus I'm not	15:38:24
17	providing any opinions here in response to that report.	15:38:29
18	Do you see that, sir?	15:38:32
19	A. Yes.	15:38:33
20	Q. Okay. You agree that you have not provided any	15:38:33
21	opinions in this case regarding infringement or	15:38:37
22	noninfringement of Defendants' accused products for the	15:38:43
23	'138 and '399 patents, correct?	15:38:48
24	A. Correct.	15:38:53
25	Q. Okay. You had the opportunity to do so with	15:38:54

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1	this report but you did not include any opinions with	15:38:57
2	respect to infringement or noninfringement of the '138,	15:39:03
3	'399 patents, correct?	15:39:07
4	A. Correct.	15:39:08
5	Q. And as you sit here today, sir, at your	15:39:09
6	deposition on October 16th, 2024, you have no opinions	15:39:14
7	with respect to infringement or noninfringement of the	15:39:19
8	Defendants' accused products for the '138 and '399	15:39:23
9	patents, correct?	15:39:27
10	A. Yes, correct.	15:39:30
11	Q. Okay. Now, I'd like to introduce for you two of	15:39:31
12	the exhibits to Dr. Zane's report. So Exhibit 17 should	15:39:43
13	be Exhibit C to his report.	15:39:55
14	(Plaintiffs' Exhibit 17, Expert Report of	15:39:59
15	Dr. Regan Zane, Exhibit C, was marked for	
16	identification.)	
17	(Plaintiffs' Exhibit 18, Expert Report of	
18	Dr. Regan Zane, Exhibit D, was marked for	
19	identification.)	15:40:00
20	BY MR. OCZEK:	15:40:00
21	Q. And Exhibit 18 should be Exhibit D to the Zane	15:40:01
22	report. Have you -- let me start with Exhibit C. Have	15:40:08
23	you seen this document before which -- I'm sorry,	15:40:38
24	Exhibit C to the Zane report which is Exhibit 17 for	15:40:42
25	today's deposition.	15:40:47

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1	A.	I'm sorry, what was the -- I lost track. What	15:42:34
2		was the question?	15:43:15
3	Q.	Actually I didn't ask a question. We were just	15:43:17
4		introducing the exhibit.	15:43:20
5	A.	Oh, okay, all right.	15:43:21
6	Q.	But you've had an opportunity to go through this	15:43:22
7		exhibit?	15:43:25
8	A.	I -- in terms of scrolling through it now, I	15:43:25
9		think I hit it all.	15:43:29
10	Q.	Okay. And have you seen this document before,	15:43:31
11		sir?	15:43:33
12	A.	I might have. I apologize but I can't say for	15:43:33
13		sure really one way or the other. I'm looking for	15:43:59
14		something that -- picture -- which one -- page one, page	15:44:04
15		two. The picture on page two looks familiar, the light	15:44:17
16		bulb with the lens pulled off. There was a couple of	15:44:23
17		pictures with the lenses pulled off. I'm sorry, the	15:44:37
18		best I can do is that I may have seen it, the pictures	15:45:06
19		-- except for the -- the A19s with the lens removed are	15:45:11
20		the only ones that look familiar to me.	15:45:20
21	Q.	Okay. I'll represent to you, sir, that this	15:45:26
22		Exhibit Z [sic] to Dr. Zane's reported which is	15:45:30
23		Exhibit 17 for this deposition, this is Dr. Zane's	15:45:34
24		infringement claim charts for the '399 patent, the	15:45:40
25		asserted claims of that patent. Okay?	15:45:45

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1	A.	Okay.	15:45:49
2	Q.	All right. And I believe the entire document is	15:45:49
3		156 pages and Dr. Zane goes in detail methodically	15:45:55
4		through each element of each asserted claim. And my	15:46:07
5		question to you, sir, is you don't have any opinions to	15:46:10
6		rebut Dr. Zane's element-by-element analysis that each	15:46:14
7		of the asserted claims infringes the accused products of	15:46:22
8		the '399 patent, correct?	15:46:28
9	A.	I wasn't asked to form an opinion.	15:46:34
10	Q.	So, therefore, you have no opinions, correct?	15:46:38
11	A.	Yes, I didn't spend any time forming an opinion.	15:46:42
12	Q.	All right. So you don't -- as you sit here	15:46:53
13		today, you haven't issued any opinions that rebut what	15:47:00
14		Dr. Zane has set forth in this Exhibit C, correct?	15:47:05
15	A.	Correct.	15:47:11
16	Q.	And you had the opportunity to do that in your	15:47:11
17		August 19th report, but you were not asked to do so,	15:47:16
18		correct?	15:47:20
19	A.	Correct.	15:47:21
20	Q.	All right. I'm going to ask you the same set of	15:47:21
21		questions on the next exhibit, which is Exhibit 18. And	15:47:27
22		this is Exhibit D to Dr. Zane's report. And I'll give	15:47:32
23		you the opportunity to look at that document. And I'll	15:47:38
24		ask the same question, which is are you familiar with	15:47:43
25		this document?	15:47:46

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1	A.	Going through it, it looks to me very similar to	15:48:30
2		Exhibit C and once again I had the same response a	15:48:36
3		couple -- the A19 pictures I may or may not have seen,	15:48:41
4		but I can't say for sure one way or the other if I've	15:48:47
5		seen this document.	15:48:53
6	Q.	Okay. I'll represent to you that Exhibit 17 --	15:48:54
7		sorry, strike that -- I'll represent to you, sir, that	15:48:59
8		Exhibit 18 is Dr. Zane's infringement claim charts for	15:49:02
9		the '138 patent for the asserted claims of this patent,	15:49:10
10		okay?	15:49:14
11	A.	Okay.	15:49:15
12	Q.	All right. And I believe this document is	15:49:16
13		93 pages long. And in this Dr. Zane goes into detail	15:49:24
14		methodically through each element of each asserted claim	15:49:30
15		of the '138 patent and my question to you, sir, is you	15:49:33
16		don't have any opinions to rebut Dr. Zane's	15:49:37
17		element-by-element analysis that each of the asserted	15:49:44
18		claim infringes the accused products of the '138 patent,	15:49:47
19		correct?	15:49:52
20	A.	I wasn't asked to form an opinion, so I have not	15:49:54
21		formed an opinion.	15:49:58
22	Q.	And so, therefore, you have no opinion, correct?	15:50:01
23	A.	Yes, I've formed no opinion.	15:50:10
24	Q.	Okay. And just to confirm as you sit here today	15:50:13
25		you haven't issued any opinions that rebut what Dr. Zane	15:50:16

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1	has set forth in this Exhibit D to his expert report,	15:50:22
2	correct?	15:50:28
3	A. Yes, if I had -- I have not formed an opinion,	15:50:28
4	so I haven't issued any opinions.	15:50:32
5	Q. Okay. And you had the opportunity to issue an	15:50:35
6	opinion in your August 19th report but you were not	15:50:40
7	asked to do so with respect to the infringement of the	15:50:44
8	'138 patent, correct?	15:50:48
9	A. Correct.	15:50:49
10	MR. CHEN: Counsel, can we go off the	15:50:54
11	record for a second? My real time has stopped	15:50:56
12	working.	15:51:02
13	MR. OCZEK: That's fine.	15:51:05
14	THE VIDEOGRAPHER: We are going off the	15:51:06
15	record. The time is 3:51 p.m.	15:51:08
16	(Recess.)	
17	THE VIDEOGRAPHER: We are back on the	15:53:07
18	record. The time is 3:52 p.m.	15:53:08
19	MR. OCZEK: I want to introduce one more	15:53:17
20	exhibit, which will be Exhibit 19.	15:53:18
21	(Plaintiffs' Exhibit 19, Expert Report of	15:53:21
22	Dr. Jonathan Wood, Exhibit E, was marked for	
23	identification.)	15:53:22
24	MR. SWAIN: It should be in the chat.	15:53:22
25	BY MR. OCZEK:	

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1	Q.	This is -- this is Exhibit E to Dr. Wood's	15:53:26
2		report on the '577.	15:53:31
3	A.	Okay. I have the report up -- the exhibit up.	15:55:19
4		Sorry.	15:55:23
5	Q.	Okay. So you've had an opportunity to scroll	15:55:23
6		through this exhibit?	15:55:25
7	A.	Yes.	15:55:25
8	Q.	Have you seen this document before?	15:55:26
9	A.	There are more pictures in here that I	15:55:27
10		recognize, but that's not enough to let me be able to	15:55:38
11		say for sure whether or not I've seen this exhibit.	15:55:46
12	Q.	Okay. I'll represent to you, sir, that this	15:55:51
13		Exhibit E to Dr. Wood's report, which is Exhibit 19 for	15:55:56
14		today's deposition, this is Dr. Wood's infringement	15:56:02
15		claim charts for the '577 Patent, the asserted claims of	15:56:08
16		that patent. Okay?	15:56:14
17	A.	Okay.	15:56:15
18	Q.	And this document is -- this document is 128 --	15:56:16
19		sorry. Strike that.	15:56:51
20		It's 125 pages long, and in this document	15:56:53
21		Dr. Wood goes in detail with respect to each element of	15:57:03
22		each asserted claim of the '577 with respect to the	15:57:13
23		defendants' Accused Products. And my question to you,	15:57:20
24		sir, is, you don't have any opinions to rebut Dr. Wood's	15:57:24
25		element-by-element analysis that each of the asserted	15:57:30

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1	claims infringes or is infringed by the Accused Products	15:57:35
2	of the '577 Patent, correct?	15:57:42
3	A. Yes. I haven't formed an opinion on that.	15:57:51
4	Q. Okay. So, therefore, you have no opinions with	15:57:53
5	respect to this exhibit, correct?	15:57:56
6	A. Yes.	15:57:58
7	Q. "Yes," meaning correct?	15:58:00
8	A. "Yes," meaning I haven't formed any opinions.	15:58:04
9	Q. And as you sit here today, sir, you haven't	15:58:07
10	issued any opinions that rebut what Dr. Wood has set	15:58:11
11	forth in his Exhibit E, correct?	15:58:19
12	A. Correct.	15:58:22
13	Q. And you had the opportunity to do that in your	15:58:23
14	August 19th report but were not asked to do so, correct?	15:58:27
15	A. Correct.	15:58:31
16	Q. With respect to Dr. Zane's and Dr. Wood's	15:58:32
17	reports, both of them attached copies of their CVs to	15:58:44
18	the reports, just like you attached a copy of your CV to	15:58:49
19	your report. Do you recall looking at the CVs for	15:58:52
20	Dr. Zane and Dr. Wood?	15:58:57
21	A. I'm trying to remember if their CVs came along	15:59:00
22	with the reports in -- in terms of the -- the copies of	15:59:21
23	the report that I got. Because one of the reports --	15:59:26
24	and I'm not sure which one -- I thought I remembered	15:59:41
25	Googling or checking something on the -- with the	15:59:45

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1	supply voltage fluctuations. Do you agree with that,	17:39:25
2	sir?	17:39:30
3	MR. CHEN: Objection. Asked and	17:39:30
4	answered.	17:39:31
5	THE WITNESS: Yes, I could see that	17:39:32
6	happening.	17:39:39
7	BY MR. OCZEK:	17:39:40
8	Q. Okay. And when he's talking about supply	17:39:40
9	voltage fluctuations, he's talking to -- about the	17:39:42
10	supply into the -- the PWM switch 52, right? So voltage	17:39:46
11	can go up, voltage can go down, and the output of what's	17:39:51
12	being emitted by the light -- the LEDs is it's going to	17:39:56
13	stay substantially or relatively constant, right?	17:40:00
14	That's what Timmermans is telling us, correct?	17:40:04
15	A. Yes.	17:40:08
16	Q. Sir, do you believe the disclosure of	17:40:11
17	Timmermans, as described and disclosed in 2001, teaches	17:40:31
18	one of ordinary skill in the art to build the circuitry	17:40:35
19	and LED tube that's set forth in the Timmermans patent?	17:40:48
20	MR. CHEN: Objection.	17:41:07
21	THE WITNESS: I'm sorry. One more time	17:41:12
22	on that.	17:41:13
23	BY MR. OCZEK:	17:41:14
24	Q. Sure.	17:41:15
25	Do you believe the disclosure of Timmermans, as	17:41:15

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1 described and disclosed in 2001, teaches one of ordinary
2 skill in the art to build the power supply circuitry and
3 LED tube that's set forth in the Timmermans patent?

17:41:18

17:41:23

17:41:31

4 A. Minus the parts I'm objecting to, yes.

17:41:39

5 Q. Is it your opinion, sir, that everything

17:41:49

6 disclosed in Timmermans is not fully enabled to one of

17:42:19

7 ordinary skill in the art as of the filing date in 2001?

17:42:25

8 MR. CHEN: Objection. Calling for legal
9 conclusion.

17:42:31

17:42:38

10 THE WITNESS: Okay. I'm sorry. I'm

17:42:38

11 rereading -- I may have misread something because

17:43:43

12 I'm now not finding where it was looking like he

17:43:48

13 was adjusting the intensity to compensate for

17:43:50

14 variations in light output -- I mean variations in

17:43:55

15 light output that occur due to supply voltage

17:44:01

16 fluctuations. You can monitor that by monitoring

17:44:08

17 the supply voltage. Ambient temperature requires

17:44:10

18 other -- requires another sensor, and other such

17:44:14

19 factors requires other such factors' sensors.

17:44:18

20 And so that's kind of my problem to -- he

17:44:24

21 can -- he discloses everything one of ordinary

17:44:31

22 skill in the art would need to build his tube and

17:44:36

23 his power supply and the -- the circuit. He

17:44:40

24 doesn't disclose how to do the user input, and he

17:44:45

25 certainly doesn't disclose how to use his

17:44:51

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1	circuit -- to put in components in his circuit to	17:44:54
2	be able to compensate for temperature changes.	17:44:59
3	So when you're saying does he -- just in	17:45:05
4	what he discloses, does he disclose the ability for	17:45:09
5	one of ordinary skill to be able to build his	17:45:13
6	product -- build his -- his invention, yeah, I --	17:45:17
7	let me just quick check, but I don't believe	17:45:29
8	there's any kind of temperature claim.	17:45:32
9	Yeah, okay. He's not listing a	17:46:12
10	temperature claim on that, so, yes. Sorry. Long	17:46:14
11	time to get to that, but...	17:46:18
12	BY MR. OCZEK:	17:46:20
13	Q. Would you agree it would be possible to regulate	17:46:22
14	the intensity of light in res- -- in response to voltage	17:46:25
15	and temperature fluctuations by monitoring the current	17:46:31
16	drawn by the LED?	17:46:36
17	MR. CHEN: Objection. Lack of	17:46:45
18	foundation.	17:46:47
19	THE WITNESS: What was your first one, to	17:46:47
20	monitor the...	17:46:49
21	BY MR. OCZEK:	17:46:53
22	Q. Let me ask it again.	17:46:54
23	Would you agree it would be possible to regulate	17:46:55
24	the intensity of light in response to voltage and	17:46:58
25	temperature fluctuations by monitoring the current drawn	17:47:01

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1	but there's no description of what to do or how to	18:11:56
2	do it.	18:12:00
3	BY MR. OCZEK:	18:12:06
4	Q. Sir, is it your opinion that the disclosure of	18:12:06
5	Timmermans as of 2001 was not fully enabled to one of	18:12:09
6	ordinary skill in the art?	18:12:19
7	MR. CHEN: Objection. Calling for legal	18:12:21
8	conclusion. Mischaracterizes witness prior	18:12:25
9	testimony.	18:12:27
10	THE WITNESS: It -- it's missing those	18:12:28
11	two pieces. It's missing the -- his part 3 or	18:12:40
12	whatever that was, the option 3, and it's missing	18:12:46
13	the user inner put -- user input in terms of	18:12:50
14	teaching you how to achieve this -- this device.	18:12:58
15	BY MR. OCZEK:	18:13:03
16	Q. Would a person of ordinary skill in the art in	18:13:04
17	2001 know how to provide the user input?	18:13:06
18	A. I would say no simply because when I'd be	18:13:17
19	meeting there with the folks in Michigan in 2009 and	18:13:29
20	'10, they were still struggling with fluorescent	18:13:39
21	replacement tubes, and -- and the meetings that I was	18:13:43
22	at, there were no discussions regarding any kind of user	18:13:47
23	inputs. They were still working on how do you actually	18:13:52
24	get a bulb that you can turn around and replace a	18:13:55
25	fluorescent tube with.	18:14:01

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1 So I don't -- and the reason -- particularly on 18:14:03
2 the user interface, it may -- it might be relatively 18:14:06
3 easy to do it from an electronics point of view, but 18:14:11
4 from the point of view of the -- how do you do it, where 18:14:19
5 do you put it, how do you allow the person to access 18:14:22
6 it -- again, it's a fluorescent tube, it's up in the 18:14:25
7 ceiling -- I don't think somebody of ordinary skill in 18:14:28
8 the art would know that, because how many people of 18:14:34
9 ordinary skill in the art are trying to make adjustments 18:14:37
10 on a -- or trying to turn off switch -- like fluorescent 18:14:40
11 switches just to turn it on and off, if it's up in the 18:14:43
12 ceiling? 18:14:47

13 So to me, that's a major, major thing that the 18:14:50
14 lighting industry has struggled with for a while, and 18:14:55
15 certainly was struggling with it at this point. 18:15:01

16 Q. Eight years after the filing of Timmermans? 18:15:06

17 A. Yes. 18:15:10

18 Q. So is it your opinion, sir, that the entire 18:15:11
19 disclosure of Timmermans was not fully enabled as of the 18:15:18
20 filing date in 2001? 18:15:26

21 MR. CHEN: Objection. Asked and 18:15:30
22 answered. Calling for legal conclusions. 18:15:32

23 Mischaracterizing witness prior testimony. 18:15:35

24 BY MR. OCZEK: 18:15:40

25 Q. Sir? 18:15:41

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1	Q.	Sure. Let me ask it again.	18:55:38
2	A.	Okay.	18:55:40
3	Q.	Would a person of ordinary skill in the art know	18:55:40
4		how to make or use the invention of Timmermans from the	18:55:46
5		disclosure in the patent, coupled with information known	18:55:53
6		in the art, without undue experimentation?	18:55:58
7		MR. CHEN: Objection. Form.	18:56:10
8		THE WITNESS: Well, I said before	18:56:11
9		Timmermans doesn't totally disclose everything that	18:56:13
10		he has in his patent back to the user input. So	18:56:17
11		someone of ordinary skill in the art would not be	18:56:26
12		able to -- be able to use, without major	18:56:29
13		experimentation, I believe, to try to start putting	18:56:38
14		that user input. If you want to -- if that's	18:56:42
15		dropped out and the temperature feedback is dropped	18:56:47
16		out, my answer would be yes.	18:56:51
17		BY MR. OCZEK:	18:56:55
18	Q.	Are those all the aspects that you believe are	18:56:57
19		not disclosed in Timmermans, coupled with information	18:57:01
20		known in the art, without undue experimentation?	18:57:11
21		MR. CHEN: Objection. Form.	18:57:16
22		THE WITNESS: To produce the -- the --	18:57:18
23		the fluorescent replacement tube that Timmermans	18:57:23
24		dis- -- discloses the -- what he's invented.	18:57:29
25		BY MR. OCZEK:	18:57:38

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1 Q. So would a person of ordinary skill in the art
2 know how to make or use the entire invention of
3 Timmermans from the disclosures in the patent, coupled
4 with information known in the art, without undue
5 experimentation?

18:57:49

18:57:52

18:57:57

18:58:03

18:58:06

6 MR. CHEN: Objection to form. Asked and
7 answered.

18:58:09

18:58:11

8 THE WITNESS: No, because the user input,
9 there's no information on that.

18:58:13

18:58:17

10 BY MR. OCZEK:

18:58:22

11 Q. Okay, sir, that's all for today.

18:58:28

12 A. Thank you.

18:58:31

13 MR. CHEN: Okay. How much time do we
14 have on the record?

18:58:34

18:58:36

15 THE VIDEOGRAPHER: Let's take us off the
16 record real quick.

18:58:37

18:58:38

17 We're going off the record, and the time
18 is 6:58 p.m.

18:58:40

18:58:42

19 (Volume II was concluded at 6:58 p.m.)
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21
22
23
24
25